UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ATLANTIC SECURITY BANK,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 11-02730 (SMB)

STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant Atlantic Security Bank ("Defendant") may move, answer, or otherwise respond to the Trustee's complaint (the "Complaint") is extended up to and including November 21, 2014. The pre-trial conference will be adjourned from December 17, 2014, at 10:00 a.m. to January 28, 2015, at 10:00 a.m.

The purpose of this stipulated extension (the "Stipulation") is to provide additional time for Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this

Stipulation is a waiver of Defendant's right to request from the Court a further extension of time to answer, move against, or otherwise respond and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: October 8, 2014 New York, New York

BAKER & HOSTETLER LLP

By: /s/ Thomas L. Long 45 Rockefeller Plaza New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Marc E. Hirschfield

Email: mhirschfield@bakerlaw.com

Thomas L. Long

Email: tlong@bakerlaw.com

Attorneys for Plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC

ARNOLD & PORTER LLP

By: /s/ Andrew T. Karron 555 Twelfth Street, NW Washington, DC 20004 Telephone: (202) 942-5000 Facsimile: (202) 942-5999

Andrew T. Karron

Email: Andrew.Karron@aporter.com

Scott B. Schreiber

Email: Scott.Schreiber@aporter.com

Attorneys for Atlantic Security Bank